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12 ASPEN SPECIALTY INSURANCE
13 COMPANY

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16
17 ASPEN SPECIALTY INSURANCE
18 COMPANY,

19 Plaintiff,

20 v.
21 CHIEF CONCRETE, INC. and DOES 1 to 100,
22 inclusive,

23 Defendants.

24 CASE NO. 2:13-cv-00252-GMN-PAL

25 **STIPULATION AND ORDER TO**
EXTEND PRETRIAL DEADLINES
(FIRST REQUEST)

26 Plaintiff, ASPEN SPECIALTY INSURANCE COMPANY, by and through its counsel
27 GALINA KLETSER JAKOBSON of SELMAN BREITMAN LLP and Defendant CHIEF
28 CONCRETE, INC., by and through its attorney, TYLER J. WATSON of KRAVITZ,
SCHNITZER, SLOANE & JOHNSON, CHTD., hereby stipulate to extend by 90 days the current
pretrial deadlines, to include deposition discovery, the deadline for dispositive motions and the
submission of the pretrial order. This extension is requested because the parties need additional
time to meet and confer regarding responses to written discovery requests and schedule
depositions to properly understand the facts, circumstances and issues of this case.

1 Based on this stipulated agreement, the parties request that all current discovery dates be
2 extended by 90 days. The parties propose the following deadlines:

3 1. Discovery cutoff: December 27, 2013;

4 2. Dispositive motions: January 27, 2014;

5 3. Pretrial order: February 27, 2014, unless dispositive motions are filed which will
6 extend the date to file the pretrial order until 30 days after the decision on the dispositive motions,
7 or upon further order by the court extending the time period in which to file the joint pretrial order.

8 There is no trial date currently set.

9 This request is sought in the interest of justice and not for the purposes of delay. None of
10 the parties will be prejudiced by this requested extension.

11 DATED: September 6, 2013

SELMAN BREITMAN LLP

12 By: /s/ Galina Kletser Jakobson

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20 DATED: September 6, 2013

21 KRAVITZ, SCHNITZER, SLOANE & JOHNSON,
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23 By: /s/ Tyler J. Watson

24 GARY E. SCHNITZER, ESQ.

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30 Attorneys for Defendant

31 **ORDER**

32 IT IS SO ORDERED.

33 _____
34 U.S. DISTRICT COURT JUDGE

35 DATED: _____